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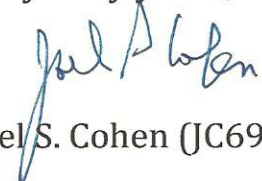
The Honorable Miriam Goldman Cedarbaum
Senior United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: United States v. Lin Xing
Docket No. 11 Cr. 114 (MGC)

Dear Judge Cedarbaum:

Please accept the defendant Lin Xing's Voir Dire requests set forth below.
Thank you.

Very truly yours,


Joel S. Cohen (JC6998)

cc: Peter Skinner, AUSA
Jennifer Burns, AUSA

1. Where were you born?

IF BORN OUTSIDE OF THE US:

How long have you lived in the U.S.?

When did you become a citizen?

Do you speak or understand Mandarin or Fukienese?

Will you accept the interpretation of the official court interpreter even if it conflicts with your own understanding of an answer given in Chinese?

2. Do you have any difficulty speaking or understanding English?

3. Did your family immigrate to the United States?

IF YES: How long ago was this?

What country/countries did they come from?

4. Have you or any close friends or relatives ever been employed by or otherwise affiliated with any law enforcement agency or organization as an employee or volunteer? (This could include, for example, police, sheriff, state trooper, prison guard, INS, Homeland Security, FBI, IRS agent, parole or probation department.)

IF YES: Who was this and which agency?

What did that person do there?

For how long?

5. Have you or anyone close to you ever considered working in law enforcement or applied for a job in law enforcement or with the Immigration and Naturalization Service or Homeland Security, FBI or any other law enforcement agency ?

IF YES: Who? (Please provide details)

6. Have you or anyone close to you ever been employed in a law office?
7. Have you or anyone close to you ever been employed in a U.S. Attorney's Office, a District Attorney's office ?
8. Have you ever had any contact with the Immigration and Naturalization Service or Homeland Security for any reason?
9. Please describe what you do at your job.
10. Do you have, or have you ever had, the authority to hire and fire?
11. Have you ever been to Chinatown in Manhattan or Queens ?

IF YES: How often?

12. Have you ever had safety concerns do you have when you are in Chinatown?

13. The defendant in this case was born in China.

Do you have any feelings or opinions about immigrants in general or immigrants from China?

IF YES: please explain:

14. The defendant in this case is from Fujian, China. Have you read or heard anything about this part of China?

IF YES: What have you read or heard?

15. The defendant in this case does speak or understand English very well. What is your opinion about immigrants who do not speak English well?

16. Would you be affected in any way by the race, ethnicity or nationality of the defendant or the fact that he uses the assistance of an official Court interpreter ?

17. Do you believe there should be a limit on the number of Chinese immigrants to this country?

18. How serious a problem do you think illegal immigration is today?

19. If you were selected as a juror for a criminal case would you expect the defendant to prove his innocence?

IF YES: please explain:

Have you any experiences, or do you have any opinions or feelings that might make it difficult for you to serve as a fair and impartial juror in this case?

20. Is there any reason you know of why you should not serve as a juror in this case?

IF YES: please explain.

21. Is there anything else that you think the court and lawyers should know about you in deciding whether or not you should serve as fair and impartial juror in this case?

IF YES: please explain.

Thank you.